



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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November 10, 1993

Mr. Dan Bauer
AKZO Salt of Utah
1428 James Palmer Road
Lake Point, Utah 84074

Re: Status of Large Mining Operations Notice of Intention, AKZO Salt of Utah,
Timpie Solar Ponds, M/045/030, Tooele County, Utah

Dear Mr. Bauer:

This letter is meant to clarify which permitting issues have been resolved and which issues remain to be resolved at this time. In a phone conversation with Mr. Bill Brimson of AKZO, I discussed a draft list of permitting issues. This letter includes a list of permitting issues based on the Division's 12/22/92 letter and the 4/9/93 inspection memo. Permitting issues raised in these documents which have already been resolved are included in the list to assist in tracking. Italicized print was used to describe the current status of each issue.

Please review this list and provide a written response at your earliest convenience. When formulating your response please format your comments in a manner matching the list here. This makes the review process easier and quicker.

Issues from the Division December 22, 1992 Review Letter

Roads with/without a postmining land use need to be identified and agreed upon. This item relates to the surety calculation and a variance request.
The Division and AKZO need to come to an agreement on this issue.

AKZO's proposal for removal of salt soils in Plot C is acceptable, but AKZO will be required to meet the revegetation standards in this area. If the standard cannot be met in this manner Akzo may be required to import borrowed topsoil. *At the April 1993 inspection it seemed AKZO agreed to place topsoil on Plot C. AKZO was to investigate their current permits for a source of borrow material.*



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A site inspection to evaluate the adequacy of the erosion and control measures needs to be performed. *The Division needs to comment on this issue.*

A site inspection to evaluate the adequacy of surface drainage control in the salt storage-processing-loadout areas needs to be performed. *The Division needs to comment on this issue.*

AKZO accepted the suggested seed mix and rates. *AKZO needs to accept the recommendation in writing. Also see the comment in April 1993 inspection memo regarding another seed type to add to the mix.*

A site inspection needs to be performed to identify portions of the facility area to be reclaimed, or granted a variance due to a post mine land use. *The Division and AKZO need to come to an agreement on this issue. Also see the comment in the April 1993 memo regarding adding conditions into the permit.*

The Division needs to receive a proposed surety form and completed Reclamation Contract from AKZO. *The Division received draft versions of the surety and reclamation contract on March 18, 1993. These drafts were edited and returned to AKZO during the April 1993 inspection.*

Items from the April 9, 1993 Inspection Memo

The Division needs to evaluate conditioning the permit to assume certain structures/facilities will have a post-mine land use, but if they do not have such a use at the time of final reclamation AKZO must reclaim them. *The Division needs to discuss this issue internally and with legal counsel.*

The Division needs to review the Great Salt Lake Minerals plan for variances for post-mine land use. AKZO modeled their application after the Great Salt Lake Minerals application. *The Division needs to review the Great Salt Lake Minerals application.*

The Division is to decide on the recommended depth of soil to be placed on Plot C. AKZO agreed to the idea of importing borrowed soil. AKZO is to evaluate and identify possible borrow sites (resources, permission) *The Division needs to respond by providing a recommended soil depth. AKZO needs to provide information regarding possible borrow sites.*

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AKZO is to install a berm or trench near the fence line east of the Salt Washing Facility. *AKZO needs to construct the berm/trench if they have not already done so. If conditions do not permit construction now, AKZO needs to commit in writing to constructing the features.*

Division to re-evaluate the reclamation surety with respect to the site features not included in the previous drawings supplied by AKZO. *The Division needs to complete this evaluation.*

AKZO is to provide a fuel spill prevention and cleanup plan, plus a description of the fuel facility. *AKZO needs to provide this information.*

AKZO is to provide a revised drawing to include the new features plus sections, townships, and ranges. *A revised drawing was provided which included the new facilities, however, townships, ranges and sections were not included in the drawing. AKZO needs to provide the Division with a revised drawing.*

AKZO needs to review the Division's edits on the Reclamation Contract and surety bond forms and make corrections. *AKZO needs to provide the Division with any comments or corrections to these forms. The surety amount may need to be adjusted (see above comment on reclamation surety).* The Division sent a blank bond form to BB&T on 8/24/93.

As a result of the inspection, the Minerals revegetation specialist recommends adding shadscale (*atriplex confertifolia*) at 2 lb/acre to the recommended seed mix. *AKZO needs to indicate their agreement/acceptance of the amended mix in writing. A complete listing of the seed mix and rates should be included in AKZO's response.*

It may be helpful to plan a meeting to discuss these permitting issues after you have reviewed this letter. If you have any questions regarding this letter please contact me. Thank you for your time and attention in this permitting matter.

Sincerely,



Anthony A. Gallegos
Reclamation Engineer